

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE

WILFRED RIVERA COLON
LAURA ROSA SANTIAGO BARBOSA
DEBTORS

CASE NO. 13-07692 ESL

CHAPTER 13

**DEBTORS' MOTION REQUESTING ORDER FOR AUTHORIZATION TO BEGIN
EVALUATION OF LOSS MITIGATION WITH MORTGAGE CREDITOR**

TO THE HONORABLE COURT:

NOW COME, **WILFRED RIVERA COLON and LAURA ROSA SANTIAGO BARBOSA**, the Debtors, through the undersigned attorney, and very respectfully state and pray as follows:

1. The Debtors are the owners of a residential real property encumbered by a mortgage in favor of secured creditor Franklin Credit Management Corp. as Service Agent of Deutsche Bank National Trust Co. (hereinafter "Franklin"), previously Scotiabank Puerto Rico (See Docket No. 50 Transfer of Claim), which secured creditor filed POC #2-1, in the above captioned case.

2. The Debtors respectfully state that they wish to apply for a mortgage loan modification and to begin evaluation for a loss mitigation or loan modification of the aforestated mortgage loan with Franklin.

3. Therefore, the Debtors respectfully request an Order from this Honorable Court authorizing the Debtor to meet with Franklin to begin the evaluation for loss mitigation or mortgage loan modification.

WHEREFORE, the Debtors respectfully request this Honorable Court grant the present motion and enter an Order approving authorization for the Debtors to initiate a loss mitigation or loan modification evaluation with secured creditor Franklin, in the above captioned case.

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Motion Requesting Authorization
for Loss Mitigation Evaluation
Case no. 17-02111 MCF13

NOTICE: Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006 (f) if you were served by mail, any party against whom this paper has been served, or any other party to the action that objects to the relief sought herein shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I **CERTIFY** that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of same to the Chapter 13 Trustee and all system participants; I also certify that a copy of this motion was sent via US Mail to the Debtors and to all CM/ECF non-participants, creditors and parties in interest appearing in the master address list, hereby attached.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 6th day of February, 2018.

/s/Roberto Figueroa Carrasquillo
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